

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

2019 MAY 22 PM 2:07 SH

(Del. Rev. 5/2014) Pro Se Employment Discrimination Complaint

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Ireneé White

(Name of Plaintiff or Plaintiffs)

v.

Civ. Action No. 19 - 948
(To be assigned by Clerk's Office)

Fairville Management Company, LLC COMPLAINT FOR
EMPLOYMENT DISCRIMINATION
(Pro se)

(Name of Defendant or Defendants)

Jury Demand?

☒ Yes

☐ No

1. This action is brought pursuant to (check all spaces that apply):

- ☐ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, sex, or national origin.
- ☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age. My year of birth is: _____.
- ☐ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.
- ☒ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.

2. Plaintiff resides at 411 N. Jefferson St.
(Street Address)
Wilmington New Castle DE 19801
(City) (County) (State) (Zip Code)

(Area Code) (Phone Number) Attach additional sheets if more than one Plaintiff.

3. Defendant resides at, or its business is located at 726 Yorklyn Road, Suite 200
(Street Address)
Hockessin New Castle DE 19707
(City) (County) (State) (Zip Code)

Attach additional sheets if more than one Defendant.

4. The discriminatory conduct occurred in connection with plaintiff's employment at, or application to be employed at, defendant's Fairville Management Company, LLC place of business

(Defendant's Name)
located at 726 Yorklyn Road, Suite 200
(Street Address)
Hockessin New Castle DE 19707
(City) (County) (State) (Zip Code)

5. The alleged discriminatory acts occurred on 10 October 2016
(Day) (Month) (Year)

6. The alleged discriminatory practice ☐ is ☒ is not continuing.

7. On 9 January 2017, Plaintiff filed charges
(Day) (Month) (Year)

with the Department of Labor of the State of Delaware: Office of Anti Discrimination
(Agency)
4425 N. Market St Wilmington New Castle
(Street Address) (City) (County)
DE 19802, regarding defendant's alleged discriminatory conduct.
(State) (Zip Code)

8. On 1 December 2016, Plaintiff filed charges
(Day) (Month) (Year)
with the Equal Employment Opportunity Commission of the United States regarding defendant's alleged discriminatory conduct.

9. The Equal Employment Opportunity Commission issued the attached Notice-of-Right-to-Sue letter which was received by plaintiff on: 28 February 2019
(Day) (Month) (Year)

(NOTE: ATTACH NOTICE-OF-RIGHT-TO-SUE LETTER TO THIS COMPLAINT.)

10. The alleged discriminatory acts, in this suit, concern:

- A. ☐ Failure to employ plaintiff.
- B. ☒ Termination of plaintiff's employment. Plaintiff was terminated from employment on the following date: October 10, 2016.
- C. ☐ Failure to promote plaintiff. Plaintiff was refused a promotion on the following date:
- D. ☒ Other acts (please specify): Retaliation and
discrimination against disabilities.

11. The conduct of Defendant(s) was discriminatory because it was based on (check all that apply):

- A. ☐ Plaintiff's race
- B. ☐ Plaintiff's color
- C. ☐ Plaintiff's sex
- D. ☐ Plaintiff's religion
- E. ☐ Plaintiff's national origin
- F. ☐ Plaintiff's age
- G. ☒ Plaintiff's disability

12. A copy of the charges filed with the Department of Labor of the State of Delaware and/or the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of plaintiff's claim.

(NOTE: ATTACH A COPY OF THE CHARGES FILED WITH THE DEPARTMENT OF LABOR OF THE STATE OF DELAWARE AND/OR THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSION OF THE UNITED STATES TO THIS COMPLAINT.)

THEREFORE, Plaintiff asks the Court to grant such relief as may be appropriate, including but not limited to (check all that apply):

- A. ☒ Injunctive relief (specify what you want the Court to order): Ensure a safe work environment with security cameras, bullet proof glass and a security officer to monitor all properties.
- B. ☒ Back pay.
- C. ☐ Reinstatement to former position.
- D. ☒ Monetary damages in the amount of \$100,000.
- E. ☐ That the Court appoint legal counsel.
- F. ☒ Such relief as may be appropriate, including costs and attorney's fees.
- G. ☒ Other (specify): Punitive and compensatory damages \$120,000

I/We declare under penalty of perjury that the foregoing is true and correct.

Dated: 5/22/19

Doree White
(Signature of Plaintiff)

(Signature of additional Plaintiff)

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.